REMARKS

Claims 1-6 are pending in the present application. Claims 1, 3, and 5 are independent.

EMBODIMENT OF THE INVENTION

The Applicant respectfully provides the Examiner with a summary of an embodiment of the present invention. Referring to Fig. 2 and page 5, lines 20 through page 6, lines 16 of the specification, an example of a successful authentication of a subscriber of an ANS-41 system 14 in GSM system 12 for an initial access attempt is shown. User equipment 16 associated with the subscriber uses a MIN-based IMSI as its identifier in the GSM system 12. As shown in step a, a mobile station (MS) or user equipment determines that a new servicing system, the GSM system 12, has been entered. The MS registers at the GSM system 12 and requests for system access by providing its MIN-based IMSI to the GSM system 12 in a location area update message. The GSM system then sends an authentication information message (SEND_AUTHENTICATION_INFO) having the IMSI **to the IIF 10 (Step b). The IIF 10 sends an AUTHREQ**, which includes MSCID, SYSCAP, MIN, ESN, and SYSACCTYPE, to the HLR of the ANS-41 system 14 (Step c). MSCID identifies the IIF 10. SYSCAP indicates that the subscriber is roaming in the GSM system 12. MIN is the Mobile-station Identification Number, which is based on an International Mobile-station Subscriber Identification number. ESN is an Electronic Serial Number of the subscriber associated with the MIN. SYSACCTYPE indicates GSM system access.

In step d, the HLR forwards the AUTHREQ to an authentication center (AC). In step e, the AC determines that the subscriber is roaming in the GSM system 12 based on the SYCAP and responds with an authreq to the HLR. Then, in step f, **the HLR forwards the authreq to the IIF 10**. Lastly, in step g, the IIF 10 determines one or more groups of GSM triplets using the subscriber's SSD and CAVE algorithm and sends a SEND_AUTHENTICATION_INFO ackenowledgement to the GSM system 12.

REJECTION UNDER 35 U.S.C. § 102(e)

Claims 1, 3, and 5 stand rejected under 35 U.S.C. § 102 (e) as being anticipated by Berenzweig. Applicant respectfully traverses this art grounds of rejection.

Applicants provide the Examiner with a communication flow diagram of the disclosed invention in Berenzweig. Applicants respectfully request the Examiner to refer to the following communication flow diagram during the description of the Berenzweig methodology provided below.
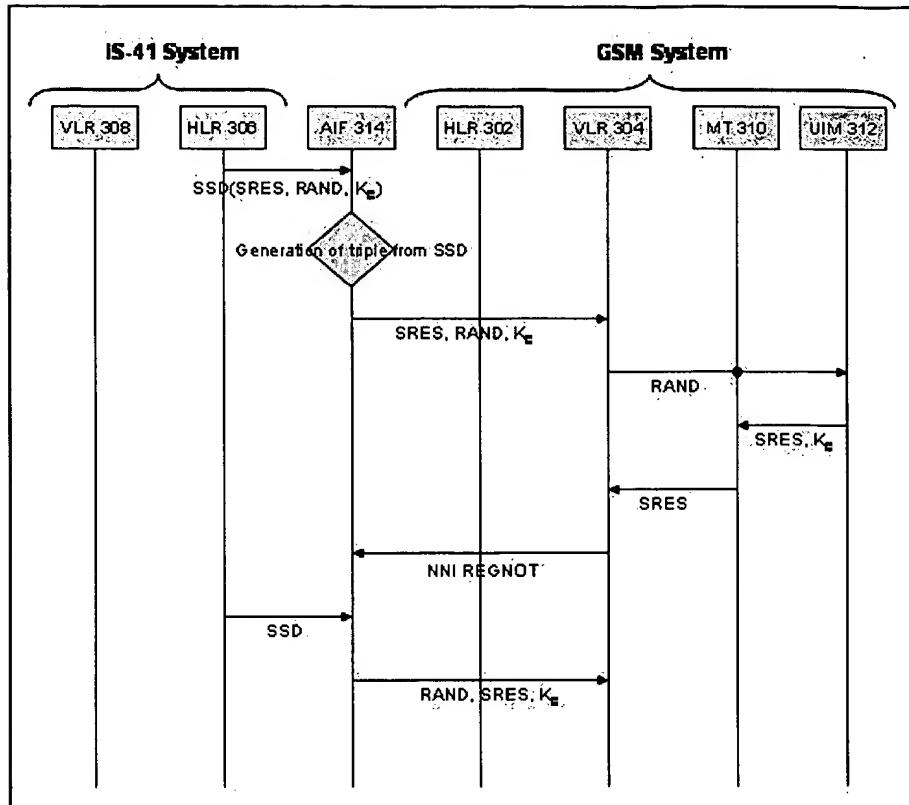
Communication Flow Diagram for Berenzweig

Referring to fig. 9 and col. 5, line 21 through X of Berenzweig, a method for

authentication of users in a wireless network as the user roams between two

communication systems with differing authentication schemes is disclosed. When an IS-

41 mobile terminal (MT) 310, having a user identification module (UIM) 312, roams to a

GSM network, a SSD is sent to the AIF 314 by HLR 306. The AIF 314 generates an

authentication triplet from the SSD. Once the triplet is generated it is sent to the VLR

304 by the AIF 314. The VLR 304 authenticates the UIM 312 by sending RAND, of the

triplet, to the UIM 312 via the MT 310. The UIM 312 generates SRES and K_C with the

RAND and the SSD, and sends SRES and K_C to the MT 310. The MT 310 sends SRES

to the VLR 304, which compares this SRES with the SRES received from the AIF 314 to

authenticate the user. The GSM VLR 304 sends a request for triplets to the AIF 314 via NNI REGNOT. **The AIF 314 then retrieves the user's SSD from the IS-41 HLR 306 and uses it to calculate triplets. The triplets are sent by the AIR 314 to the GSM VLR 304 via NNI REGNOT.** Nowhere does Berenzweig disclose or suggest "transmitting a first message to a first system from an Interoperability/Interworking Function (IIF), **the first message comprising a mobile identifier for a subscriber of the first and a second system indicator indicating that the subscriber is attempting to gain access to a second system** that uses an authentication process different than an authentication process used by the first system" as recited in claim 1.

Independent claims 3 and 5 include similar limitation to claim 1; and therefore, are patentable at least for the reasons stated above with respect to claim 1.

Applicants respectfully request that the Examiner withdraw this art grounds of rejection.

REJECTION UNDER 35 U.S.C. § 103 (a)

Claims 2, 4, and 6 stand rejected under 35 U.S.C. § 103 (a) as being unpatentable over Berenzweig in view of Brown. This art grounds of rejection is traversed.

Applicants respectfully refer the Examiner to section 706.02(l)(1) of the MPEP entitled "Rejections Under 35 U.S.C. 102(e)/103; 35 U.S.C. 103(c)[R-2]. This section states the following:

> Effective November 29, 1999, subject matter which was prior art under former 35 U.S.C. 103 via 35 U.S.C 102(e) is now disqualified as prior art against the claimed invention if that subject matter and the claimed invention "were, at the time the invention was made, owned by the same person or subject to an obligation of assignment to the same person." This change to 35 U.S.C. 103(c) applies to all utility, design, and plant patent applications filed on or after November 29, 1999..."

The current application was filed on May 8, 2001, which is after November 29, 1999. Both the Berenzweig Patent and the current application were at the time the invention was made owned by Lucent Technologies. Therefore, Berenzweig in view of Brown is disqualified as prior art against the claimed invention under 35 U.S.C. §103(a).

Applicant respectfully requests that the Examiner withdraw this art grounds of rejection.

CONCLUSION

In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Gary Yacura at (703) 668-8023 in the Washington, D.C. area, to discuss the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. 1.16 or under 37 C.F.R. 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY & PIERCE, P.L.C.
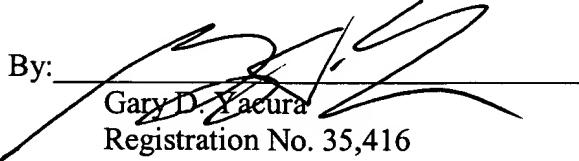
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